

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GWENDOLYN EPHRAIM,

Plaintiff,

vs.

CITY OF CHICAGO, ILLINOIS,
and CHICAGO POLICE OFFICER
J. DURAN, Star No. 6515, and
CHICAGO POLICE OFFICER
M. L. FREGOSO, Star No. 19498,

Defendants.

Case No. 07 C 7164

JUDGE JOAN H. LEFKOW

JURY TRIAL DEMANDED

PROPOSED SCHEDULING ORDER

The parties, having held a scheduling conference attended by Jeffrey B. Granich for the plaintiff and Ashley C. Kosztia for Defendant City of Chicago and Marc Boxerman for Defendant Chicago Police Officers J. Duran and M. L. Fregoso, as required by Fed. R. Civ. P. 26(f), submit the following proposed scheduling order:

- (A) The parties are in earnest settlement negotiations.
- (B) The parties shall have until April 25, 2008 to make Rule 26(a)(1) disclosures.
- (C) The following amendments to the pleadings and/or joinder of additional parties are anticipated and may be sought upon appropriate motion by June 27, 2008.
Amendments thereafter may be made only on motion for good cause shown.
- (D) Non-expert discovery will close on July 25, 2008.

- (E) The cut-off date for designation of plaintiff's trial expert(s) as provided in Fed. R. Civ. P. 26(a)(2) is August 18, 2008; for defendant's trial expert(s), August 29, 2008. Depositions of the experts shall be taken within 60 days of designation. Unless otherwise stipulated, disclosure of experts will include a report fully in compliance with Rule 26(a)(2)(B).
- (F) Any motion challenging the qualifications of a designated expert must be made within 21 calendar days after the deposition of the expert or the close of discovery, whichever is earlier. If no motion is filed, the court may deem such challenges waived.

Dispositive Motions

Before a dispositive motion is filed, the parties will exchange demand and offer letters in an effort to reach resolution of the case. A status hearing will be held on May 8, 2008, at which time the parties will report on the possibility of settlement and whether a settlement conference with a judge may be helpful. The parties should expect to be referred to a magistrate judge for settlement discussions before filing a motion for summary judgment.

Any dispositive motions (motions for summary judgment) will be presented with a proposed agreed briefing schedule by October 31, 2008.

Consent to Proceed Before a Magistrate Judge

The parties consent to have their case proceed before a magistrate judge for discovery proceedings.

Trial, Pretrial Conference, Pretrial Order

- (A) The case shall be ready for ☐ bench ☐ jury trial by _____; the trial is projected to last 3 days.
- (B) A joint pretrial order will be filed on _____. Plaintiff's draft shall be served on defendant(s) by _____ and defendant's draft shall be served on plaintiff(s) by _____.
- (C) Motions *in limine*, and responses thereto, shall be filed with the joint final pretrial order. (No reply briefs will be accepted on motions *in limine*.) Three copies of the pretrial order shall be delivered to chambers no less than one week prior to the date of the pretrial conference, which will be set on _____.

This order shall not be modified except by leave of court on motion for good cause shown.

ENTER:

Date: _____

JOAN HUMPHREY LEFKOW
U.S. District Judge